

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
GREENSBORO DIVISION**

**DR. DEIRDRA LEANE,**

**Plaintiff,**

**v.**

**WILLIAM RALPH CARTER, JR.,**

**Defendant.**

**Civil Action No. 1:21 – CV – 00514**

**DEFENDANT’S MOTION TO DISMISS**

**NOW COMES** Defendant William R. Carter, Jr., by and through his undersigned counsel, pursuant to Rules 12(b)(1), 12(h)(3), and 12(b)(6) of the Federal Rules of Civil Procedure, and hereby moves the Court to dismiss Plaintiff’s Verified Complaint for lack of subject matter jurisdiction and for failure to state a claim upon which relief may be granted. Defendant respectfully submits an accompanying Brief in Support of Motion to Dismiss, which is being filed contemporaneously with this Motion.

Respectfully submitted, this the 1<sup>st</sup> day of October, 2021.

**SIGMON KLEIN, PLLC**

By: /s/ Ben E. Klein

NC Bar No. 40993

Email: ben@sklawnc.com

By: /s/ Grant Sigmon

NC Bar No. 43205

Email: grant@sklawnc.com

*Attorneys for Defendant*

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that this day he served a copy of the foregoing document on counsel of record by electronically filing same via the ECF System, which will send notice to all counsel of record as follows:

Akiva M. Cohen (email: [acohen@kusklaw.com](mailto:acohen@kusklaw.com))  
Kamerman, Uncyk, Soniker & Klein PC  
1700 Broadway, 16<sup>th</sup> Floor  
New York, NY 10019-5977

T. Greg Doucette (email: [greg@tgdlaw.com](mailto:greg@tgdlaw.com))  
The Law Offices of T. Greg Doucette, PLLC  
311 E. Main St.  
Durham, NC 27701-3717

This the 1<sup>st</sup> day of October, 2021.

**SIGMON KLEIN, PLLC**

By: /s/ Grant Sigmon  
NC Bar No. 43205  
Email: [grant@sklawnc.com](mailto:grant@sklawnc.com)

*Attorney for Defendant*